

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
HATTIESBURG DIVISION**

**TRAVELERS CASUALTY AND SURETY COMPANY  
OF AMERICA**

**PLAINTIFF**

**v.**

**No. 2:13CV101-KS-MTP**

**HUB MECHANICAL CONTRACTORS, INC,  
CARREME B. CURRY, GEORGE C. CURRY,  
CINDY B. CURRY, MARGIE C. FAILS, PHILLIP A. FAILS  
AND ARTHUR C. HENDERSON**

**DEFENDANTS**

**MOTION FOR ADDITIONAL TIME IN WHICH TO FILE AN ANSWER ON BEHALF  
OF GEORGE C. CURRY, JR AND CINDY B. CURRY**

Comes now the Defendants, George C. Curry, Jr. incorrectly listed as George C. Curry and Cindy B. Curry, and files this their motion requesting additional time in which to file an answer the Complaint filed against him by the Plaintiff and in support would show unto this Honorable Court the following:

**I.**

The Defendants, George C. Curry, Jr. and Cindy B. Curry were no longer involved in the corporation and had requested that their names be removed from the personal guaranty. The agent for the plaintiff, Teb Jones is fully aware of the removal of these defendants names from the 2005 personal guaranty. However, Mr. Jones is currently on vacation. Counsel for Plaintiff is scheduled to start her vacation next week.

**II.**

In an effort to avoid unnecessary legal expenses to these defendants, they would request an extension of 30 days to try and resolve this issue. Their counsel had advised counsel for

plaintiff of this request. She has left a voice message advising that she does not object to the extension.

This the 6th day of June, 2013.

Respectfully submitted,

GEORGE C. CURRY, JR. and CINDY B.  
CURRY, Defendants

BY: s/S. Christopher Farris  
S. CHRISTOPHER FARRIS  
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**CERTIFICATE OF SERVICE**

I, S. CHRISTOPHER FARRIS, do hereby certify that I have this date filed the foregoing document via the Court's ECF system which served a copy upon the following counsel:

Ellie B. Word, Esq.  
Counsel for Plaintiff  
eword@kfplaw.com

DATED this, the 13<sup>th</sup> day of June, A.D., 2013.

s/S. Christopher Farris  
S. CHRISTOPHER FARRIS